

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

WILLARD N. WEISBERG TRUST UAD
3/25/98 ; and WILLARD N. WEISBERG,
individually and in his capacity as Settlor and
Trustee of the Willard N. Weisberg Trust UAD
3/25/98,

Defendants.

Adv. Pro. No. 10-04771 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including April 30, 2015.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through settlement.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: March 18, 2015

By: /s/ Nicholas J. Cremona
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
e-mail: dsheehand@bakerlaw.com
Nicholas J. Cremona
email: ncremona@bakerlaw.com
Dean D. Hunt
Email: dhunt@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*

By: /s/ Mark Thieroff
Siegel Brill, P.A.
100 Washington Avenue South
Suite 1300
Minneapolis, MN 55401
Telephone: (612) 337-6100
Facsimile: (612) 339-6591
Brian E. Weisberg
Email: brianweisberg@siegelbrill.com
Mark Thieroff
Email: markthieroff@siegelbrill.com

*Attorneys for Defendants Willard N. Weisberg
Trust UAD 3/25/98 and Willard N. Weisberg*